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Counsel for Washington Prime Group Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

CHAPTER 11

CASE NO. 18-23538-RDD

**(Joint Administration
Requested)**

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears in the above-captioned chapter 11 proceeding as counsel on behalf of Washington Prime Group Inc. (“WPG”), and requests that all notices given or required to be given in this case, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone or otherwise, which affect WPG or this chapter 11 bankruptcy case to be served upon:

Ronald E. Gold (Ohio Bar No. 0061351)
A.J. Webb (Ohio Bar No. 0093655)
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PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as nor is it a consent to jurisdiction of the Bankruptcy Court over WPG, specifically but not limited to (i) its right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which WPG is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments WPG expressly reserves.

Date: October 15, 2018

Respectfully submitted,

FROST BROWN TODD LLC

By: /s/ Ronald E. Gold

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**Counsel for Washington Prime Group
Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on this 15^h day of October, 2018, a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* was sent via ECF Noticing to all parties receiving ECF Notices in this chapter 11 case.

/s/ Ronald E. Gold
Ronald E. Gold